To: The Commission

COMMENTS OF Richard Lourette
IN RESPONSE TO NOTICE OF PROPOSED RULE MAKING

I have been interested in amateur radio for most of my life. I recently obtained my Amateur Extra class license. I am also an engineer and I am familiar with the issues that are proposed by Savin (Report No. 2462). While I agree that the use of an ID tagging system would aid productivity of world-wide shipping operations, I am concerned that the most efficient use of RF bandwidth is not being proposed.

I am concerned that the ID tagging system will be used for more than downloading shipping container contents, and that the deployment of such a system will not be limited to a few geographical locations. The system could conceivably be used anywhere. At the power levels proposed, adjacent frequencies may be burdened with much interference.

I suggest that a more prudent use of the RF bandwidth would be for only the globally unique ID's of the tagged device to be transmitted and that these ID's be used to retrieve data associated with the key using existing communications mechanisms. An approach such as this, would greatly reduce the duration of ID broadcasting as well as the required signal level, hence minimizing interference with other services.

As an amateur radio operator, I am very concerned that this service will greatly affect my use of the 70cm band. Thank you for considering my comments.

Sincerely,

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